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ATTORNEYS AT LAW

October 5, 2005

**VIA HAND DELIVERY**

The Honorable Joseph J. Farnan, Jr.  
U.S. District Court for the District of Delaware  
844 North King Street  
Wilmington, DE 19801

**Re: Uni-Diversified, Inc. and Triangle Corp. v. Spalding Sports Worldwide, Inc. and  
Russell Corporation  
U.S. District Court for the District of Delaware, C.A. 04-961 JJF  
Our File No.: 99298-00001**

Dear Judge Farnan:

Enclosed please find a proposed revised scheduling order for the above captioned case. By way of brief background, this case was stayed on February 3, 2005, for the purposes of voluntary mediation before Judge Bifferato. In spite of a full day of mediation, the case did not settle. The parties have exchanged considerable written discovery and documentation but numerous depositions still need to be taken. The parties would like to note for the Court that the schedule proposed in this revised order reflects the truly "international" nature of this case. A majority of the conduct (and possible witnesses) occurred in Japan. My primary client is in Canada and Russell's primary client is in Ireland. Either these parties will travel to the United States for depositions or the attorneys will travel to them. Either way, we believe the extra time built into the scheduling order (sixty (60) days) merely reflects the cross border nature of this dispute. Both Counsel for the Plaintiff and Defendant jointly request the Court to enter this revised Order as presented.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'William F. Taylor, Jr.'.

WILLIAM F. TAYLOR, JR.

WFT/jc

Enclosure

Cc: Brad Grout, Esq.